

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 15-CR-20040
HONORABLE JUDITH E. LEVY

-vs-

TASHUN Y. WHITE,

Defendant.

EMERGENCY MOTION TO WITHDRAW AS COUNSEL
WITH INCORPORATED MEMORANDUM OF LAW

Counsel for Defendant, Tashun Y. White, W. OTIS CULPEPPER, hereby moves this Honorable Court for an Order Allowing Withdrawal of Counsel, and in support thereof state as follows:

1. Undersigned counsel was entered his Appearance as counsel on April 13, 2016, under the Criminal Justice Act, to represent Ms. White.
2. Defendant has been charged by way of indictment with the following:

Conspiracy to Launder Monetary Instruments in violation of 18 U.S.C 1956(h), 1956(a)(1)(A)(i), 1956(a)(1)(B)(i)-(ii), 1957).
3. There has been a breakdown in the attorney client relationship to the extent that undersigned counsel is no longer able to represent Defendant.
4. That Ms. White came to my officer and initially agreed to hire me as counsel for the aforementioned case.
5. That Ms. White agreed to return to office with retainer.

6. That Ms. White never retained this office notwithstanding the fact that counsel believing Ms. White, entered and appearance in this file.

7. That Ms. White contacted me and informed me that unless I was willing to work as co-counsel with Mr. Jordan, she would prefer Mr. Jordan alone.

8. Counsel was unwilling to work as co-counsel and believed until very recently that the signed Substitution of Counsel Stipulation had been accepted by this Court for Mr. Jordan.

9. This Motion submitted pursuant to ED Mich LCrR 57.1, which provides that counsel may withdraw from a criminal matter if leave is granted by the Court. ED Mich LCrR 57(a). Allowing counsel to withdraw in this matter will not cause undue delay in the case.

10. Furthermore, allowing the withdrawal of undersigned counsel would not unfairly prejudice any party ED Mich LCrR 57.1(b).

11. It would be in the interest of justice to allow counsel to withdraw from representation in this matter. ED Mich LCrR 57.1(b).

12. Pursuant to ED Mich LR7.1, undersigned counsel has been in contact with US Attorney in this matter, Carl D.Gilmer- Hill who has no objections to the relief requested herein.

WHEREFORE, undersigned counsel respectfully requests that this Honorable Court grant the relief requested herein, and issue an Order Allowing Counsel to Withdraw.

Respectfully Submitted,

/s/ W.Otis Culpepper
W.Otis Culpepper
Attorney for Defendant
615 Griswold Street, Suite 1300
Detroit, MI 48226
(313) 963-5310

Email: otisculpepper@sbcglobal.net
Attorney Bar No. P23540

Dated: September 13, 2016

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/

CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2016, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following: CARL D. GILMER-HILL, Assistant U.S. Attorney, at carl.gilmer@usdoj.gov.

/s/ W.Otis Culpepper
W.Otis Culpepper
Attorney for Defendant
615 Griswold Street, Suite 1300
Detroit, MI 48226
(313) 963-5310
Email: otisculpepper@sbcglobal.net
Attorney Bar No. P23540

Dated: September 13, 2016